

**EXHIBIT
A**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

IBSA HASSAN,

Plaintiff,

V.

RONALD MILLER, JR., FEDEX
CUSTOM CRITICAL, INC. AND EXAM
TRANSPORT & CO., LLC

Defendant.

CIVIL ACTION NO. _____

**INDEX OF STATE COURT RECORD AND APPENDIX
IN SUPPORT OF REMOVAL**

1.	Plaintiff's Original Petition	08-09-2021
2.	Jury Demand	08-09-2021
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3.	Citation Issued on FedEx Custom Critical Inc.	08-09-2021
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5.	Plaintiff's First Amended Original Petition	08-18-2021
6.	Docket Sheet	09-07-2021

DC-21-10441
CAUSE NO. _____

IBSA HASSAN;

Plaintiff,

VS.

RONALD MILLER, JR.; FEDEX
CUSTOM CRITICAL, INC.; AND EXAM
TRANSPORT & CO LLC;

Defendants.

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IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

116th
_____ JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

Plaintiff Ibsa Hassan files Plaintiff's Original Petition complaining of Defendants Ronald Miller, Jr., FedEx Custom Critical, Inc. ("FedEx"), and Exam Transport & Co LLC ("Exam Transport").

I. DISCOVERY CONTROL PLAN

Discovery is intended to be conducted under Level 3 pursuant to Rule 190 of the TEXAS RULES OF CIVIL PROCEDURE.

II. RULE 47 PLEADING REQUIREMENTS

As required by Rule 47(b), Texas Rules of Civil Procedure, Plaintiff's counsel states that the damages sought are in an amount within the jurisdictional limits of this Court. As required by Rule 47(c), Texas Rules of Civil Procedure, Plaintiff's counsel states that Plaintiff seeks monetary relief of over \$250,000.00, but not more than \$1,000,000. The amount of monetary relief actually awarded, however, will ultimately be determined by a jury. Plaintiff also seeks pre-judgment and post-judgment interest at the highest legal rate.

III. PARTIES

Plaintiff Ibsa Hassan is an individual resident of Richardson, Dallas County, Texas. His driver's license number is *****893 and his social security number is ***-**-*061.

Defendant Ronald Miller, Jr. is an individual resident of Ocklawaha, Marion County, Florida and may be served with process at 16175 Southeast 49th Street Road, Ocklawaha, Florida 32179.

Defendant FedEx Custom Critical, LLC is a foreign corporation doing business in the State of Texas, and may be served with process through its registered agent, CT Corporation System, 1999 Bryan Street, Ste. 900, Dallas, Texas 75201. Defendant FedEx Custom Critical, LLC's principal office in the State of Texas is located in Dallas County, Texas.

Defendant Exam Transport & Co LLC is a foreign corporation doing business in the State of Texas, and may be served with process through its registered agent, Asif Alidina, 533 Greenwood Street, Kingston, Tennessee 37763.

IV. JURISDICTION AND VENUE

The Court has jurisdiction over the controversy because the damages are within the jurisdictional limits of this Honorable Court.

This Court has venue over the parties to this action since Defendant FedEx Custom Critical, LLC's principal office in the State of Texas is located in Dallas County, Texas. Venue therefore is proper in Dallas County, Texas pursuant to the TEXAS CIVIL PRACTICE & REMEDIES CODE §15.002. As well,

pursuant to TEXAS CIVIL PRACTICE & REMEDIES CODE §15.005, venue in Dallas County, Texas is also proper against the remaining Defendants as the motor vehicle crash involved herein arises out of the same occurrence.

V. FACTS

This lawsuit arises out of a motor vehicle collision that occurred on or about Wednesday, June 16, 2021 at or near the intersection of SH-114 and IH-35 West, within the city limits of Northlake, Denton County, Texas. Plaintiff Ibsa Hassan was operating his vehicle westbound on SH-114 and was coming to a stop for a red light. Defendant Ronald Miller, Jr. was operating his 18-wheeler behind Plaintiff's vehicle in the same lane and headed in the same direction. Defendant Ronald Miller, Jr. was in the course and scope of his employment with and operating under the Federal Motor Carrier authority of Defendant FedEx Custom Critical, Inc. Defendant Ronald Miller, Jr. failed to slow and/or stop, colliding hard with the back of Plaintiff's vehicle. As a result of the collision, Plaintiff was injured and continues to suffer injuries and damages from this incident.

VI. CAUSES OF ACTION

A. NEGLIGENCE – DEFENDANT RONALD MILLER, JR.

At the time of the motor vehicle collision, Defendant Ronald Miller, Jr. was operating his 18-wheeler negligently. Specifically, Defendant had a duty to exercise ordinary care and operate his 18-wheeler reasonably and prudently. Defendant breached that duty in one or more of the following respects:

1. Defendant failed to keep such proper lookout and attention to the roadway as a person of ordinary prudence would have kept under the same or similar circumstances;
2. Defendant failed to keep an assured safe distance from Plaintiff's vehicle;
3. Defendant failed to timely apply the brakes of his 18-wheeler in order to avoid the collision in question;
4. Defendant failed to control his speed; and
5. Defendant failed to safely operate his tractor-trailer.

B. NEGLIGENT ENTRUSTMENT – DEFENDANTS FEDEX AND EXAM TRANSPORT

As an additional cause of action, Plaintiff would show that at the time and on the occasion in question, Defendants FedEx and Exam Transport were the owner and insured of the vehicle driven by Defendant Ronald Miller, Jr.

Defendants FedEx and Exam Transport entrusted the vehicle to Defendant Ronald Miller, Jr. Defendant Ronald Miller, Jr. was unlicensed, incompetent, and/or reckless and Defendants FedEx and Exam Transport knew or should have known that Defendant Ronald Miller, Jr. was unlicensed, incompetent, and/or reckless. Defendant Ronald Miller, Jr.'s negligence on the occasion in question proximately caused the collision.

C. RESPONDEAT SUPERIOR – DEFENDANTS FEDEX AND EXAM TRANSPORT

Additionally, Plaintiff would show that at the time and on the occasion complained of, Defendant Ronald Miller, Jr. was in the course and scope of his employment with Defendants FedEx and Exam Transport thereby making

Defendants FedEx and Exam Transport liable under the doctrine of *Respondeat Superior*.

D. NEGLIGENCE – DEFENDANTS FEDEX AND EXAM TRANSPORT

Defendants FedEx and Exam Transport negligently hired and retained Defendant Ronald Miller, Jr. Moreover, Defendants FedEx and Exam Transport failed to properly qualify, train and/or supervise Defendant Ronald Miller, Jr. in order to prevent such collision.

VII. DAMAGES

As a proximate result of Defendants' negligence, Plaintiff suffered extensive injuries and damages. As a result of Plaintiff's injuries, Plaintiff suffered the following damages:

- a. Medical expenses in the past and future;
- b. Lost wages in the past and loss of earning capacity in the future;
- c. Property damage and loss of use of Plaintiff's vehicle;
- d. Physical impairment in the past and future;
- e. Physical pain and suffering in the past and future; and
- f. Mental anguish in the past and future.

VIII. INTENT TO USE DEFENDANTS' DOCUMENTS

Plaintiff hereby gives notice of intent to utilize items produced in discovery against the party producing same. The authenticity of such items is self-proven per TRCP 193.7.

IX. JURY TRIAL

Plaintiff demands a trial by jury and includes the appropriate jury fees.

X. U.S. LIFE TABLES

Notice is hereby given to the Defendants that Plaintiff intends to use the U.S. Life Tables as prepared by the Department of Health and Human Services.

XI. RELIEF

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that Defendants be cited to appear and answer herein, and that upon final hearing thereof, Plaintiff recover judgment against Defendants for:

1. Plaintiff's past medical expenses, which are reasonable and customary for the medical care received by Plaintiff;
2. Plaintiff's future medical expenses;
3. Plaintiff's lost wages in the past and loss of earning capacity in the future;
4. Plaintiff's property damage and loss of use of Plaintiff's vehicle;
5. Plaintiff's physical pain and suffering in the past and future in an amount to be determined by the jury;
6. Plaintiff's mental anguish in the past and future in an amount to be determined by the jury;
7. Plaintiff's physical impairment in the past and future in an amount to be determined by the jury;
8. Interest on the judgment at the legal rate from the date of judgment;
9. Pre-judgment interest on Plaintiff's damages as allowed by law;
10. All costs of court; and
11. Such other and further relief to which Plaintiff may be justly entitled.

Respectfully submitted,

WITHERITE LAW GROUP, PLLC

BY: /s/ Victor Rodriguez

VICTOR RODRIGUEZ

State Bar No. 24063577

victor.rodriguez@witheritelaw.com

SHELLY GRECO

State Bar No. 24008168

shelly.greco@witheritelaw.com

901 W. Vickery Blvd., Suite 900

Fort Worth, TX 76104

817/263-4466

817/263-4477 (fax)

ATTORNEYS FOR PLAINTIFF



FELICIA PITRE
DALLAS COUNTY DISTRICT CLERK

NINA MOUNTIQUE
CHIEF DEPUTY

CAUSE NO. DC-21-10441

IBSA HASSAN

VS.

RONALD MILLER, et al

116th District Court

ENTER DEMAND FOR JURY

JURY FEE PAID BY: PLAINTIFF

FEE PAID: 40.00

FORM NO. 353-3 - CITATION

THE STATE OF TEXAS

**To: RONALD MILLER, JR.
16175 SOUTHEAST 49TH STREET ROAD
OCKLAWAHA FL 32179**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **116th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **IBSA HASSAN**

Filed in said Court **9th day of August, 2021** against

**RONALD MILLER, JR., FEDEX CUSTOM CRITICAL, INC. AND EXAM TRANSPORT & CO
LLC**

For Suit, said suit being numbered **DC-21-10441**, the nature of which demand is as follows:
Suit on **MOTOR VEHICLE ACCIDENT** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 12th day of August, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy
KARI MALONE



ESERVE

CITATION

DC-21-10441

**IBSA HASSAN
vs.
RONALD MILLER, et al**

**ISSUED THIS
12th day of August, 2021**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: KARI MALONE, Deputy

**Attorney for Plaintiff
VICTOR R RODRIGUEZ
WITHERITE LAW GROUP PLLC
901 W VICKERY BLVD STE 900
FORT WORTH TX 76104
817-263-4466
victor.rodriguez@witheritelaw.com**

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-10441

Court No.116th District Court

Style: IBSA HASSAN

vs.

RONALD MILLER, et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____ .M. Executed at _____,
within the County of _____ at _____ o'clock _____ .M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by
me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

FORM NO. 353-3 - CITATION

THE STATE OF TEXAS

**To: FEDEX CUSTOM CRITICAL, LLC
SERVING REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET, STE. 900
DALLAS, TX 75201**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **116th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **IBSA HASSAN**

Filed in said Court **9th day of August, 2021** against

**RONALD MILLER, JR., FEDEX CUSTOM CRITICAL, INC. AND EXAM TRANSPORT & CO
LLC**

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By Kari Malone, Deputy
KARI MALONE



ESERVE

CITATION

DC-21-10441

**IBSA HASSAN
vs.
RONALD MILLER, et al**

**ISSUED THIS
12th day of August, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: KARI MALONE, Deputy

**Attorney for Plaintiff
VICTOR R RODRIGUEZ
WITHERITE LAW GROUP PLLC
901 W VICKERY BLVD STE 900
FORT WORTH TX 76104
817-263-4466
victor.rodriguez@witheritelaw.com**

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-10441

Court No.116th District Court

Style: IBSA HASSAN

vs.

RONALD MILLER, et al

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me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

FORM NO. 353-3 - CITATION

THE STATE OF TEXAS

**To: EXAM TRANSPORT & CO LLC
SERVING REGISTERED AGENT ASIF ALIDINA
533 GREENWOOD STREET
KINGSTON, TENNESSEE 37763**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **116th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **IBSA HASSAN**

Filed in said Court **9th day of August, 2021** against

RONALD MILLER, JR., FEDEX CUSTOM CRITICAL, INC. AND EXAM TRANSPORT & CO LLC

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ESERVE

CITATION

DC-21-10441

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12th day of August, 2021**

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By: KARI MALONE, Deputy

**Attorney for Plaintiff
VICTOR R RODRIGUEZ**
WITHERITE LAW GROUP PLLC
901 W VICKERY BLVD STE 900
FORT WORTH TX 76104
817-263-4466
victor.rodriguez@witheritelaw.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

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Case No. : DC-21-10441

Court No.116th District Court

Style: IBSA HASSAN

vs.

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Notary Public _____ County _____

CAUSE NO. DC-21-10441

IBSA HASSAN;

Plaintiff,

VS.

**RONALD MILLER, JR.; FEDEX
CUSTOM CRITICAL, INC.; AND EXAM
TRANSPORT & CO., LLC;**

Defendants.

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IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

116TH JUDICIAL DISTRICT

PLAINTIFF'S FIRST AMENDED PETITION

Plaintiff Ibsa Hassan files Plaintiff's First Amended Petition complaining of Defendants Ronald Miller, Jr., FedEx Custom Critical, Inc. ("FedEx"), and Exam Transport & Co., LLC ("Exam Transport").

I. DISCOVERY CONTROL PLAN

Discovery is intended to be conducted under Level 3 pursuant to Rule 190 of the TEXAS RULES OF CIVIL PROCEDURE.

II. RULE 47 PLEADING REQUIREMENTS

As required by Rule 47(b), Texas Rules of Civil Procedure, Plaintiff's counsel states that the damages sought are in an amount within the jurisdictional limits of this Court. As required by Rule 47(c), Texas Rules of Civil Procedure, Plaintiff's counsel states that Plaintiff seeks monetary relief of over \$250,000.00, but not more than \$1,000,000. The amount of monetary relief actually awarded, however, will ultimately be determined by a jury. Plaintiff also seeks pre-judgment and post-judgment interest at the highest legal rate.

III. PARTIES

Plaintiff Ibsa Hassan is an individual resident of Richardson, Dallas County, Texas. His driver's license number is *****893 and his social security number is ***-**-061.

Defendant Ronald Miller, Jr. is an individual resident of Ocklawaha, Marion County, Florida and may be served with process at 16175 Southeast 49th Street Road, Ocklawaha, Florida 32179.

Defendant FedEx Custom Critical, Inc. is a foreign corporation doing business in the State of Texas, and may be served with process through its registered agent, CT Corporation System, 1999 Bryan Street, Ste. 900, Dallas, Texas 75201. Defendant FedEx Custom Critical, Inc.'s principal office in the State of Texas is located in Dallas County, Texas.

Defendant Exam Transport & Co., LLC is a foreign corporation doing business in the State of Texas, and may be served with process through its registered agent, Gulati Law, P.L., 469 Montgomery Place, Altamonte Springs, Florida 32714.

IV. JURISDICTION AND VENUE

The Court has jurisdiction over the controversy because the damages are within the jurisdictional limits of this Honorable Court.

This Court has venue over the parties to this action since Defendant FedEx Custom Critical, Inc.'s principal office in the State of Texas is located in Dallas County, Texas. Venue therefore is proper in Dallas County, Texas pursuant to the TEXAS CIVIL PRACTICE & REMEDIES CODE §15.002. As well,

pursuant to TEXAS CIVIL PRACTICE & REMEDIES CODE §15.005, venue in Dallas County, Texas is also proper against the remaining Defendants as the motor vehicle crash involved herein arises out of the same occurrence.

V. FACTS

This lawsuit arises out of a motor vehicle collision that occurred on or about Wednesday, June 16, 2021 at or near the intersection of SH-114 and IH-35 West, within the city limits of Northlake, Denton County, Texas. Plaintiff Ibsa Hassan was operating his vehicle westbound on SH-114 and was coming to a stop for a red light. Defendant Ronald Miller, Jr. was operating his 18-wheeler behind Plaintiff's vehicle in the same lane and headed in the same direction. Defendant Ronald Miller, Jr. was in the course and scope of his employment with and operating under the Federal Motor Carrier authority of Defendant FedEx Custom Critical, Inc. Defendant Ronald Miller, Jr. failed to slow and/or stop, colliding hard with the back of Plaintiff's vehicle. As a result of the collision, Plaintiff was injured and continues to suffer injuries and damages from this incident.

VI. CAUSES OF ACTION

A. NEGLIGENCE – DEFENDANT RONALD MILLER, JR.

At the time of the motor vehicle collision, Defendant Ronald Miller, Jr. was operating his 18-wheeler negligently. Specifically, Defendant had a duty to exercise ordinary care and operate his 18-wheeler reasonably and prudently. Defendant breached that duty in one or more of the following respects:

1. Defendant failed to keep such proper lookout and attention to the roadway as a person of ordinary prudence would have kept under the same or similar circumstances;
2. Defendant failed to keep an assured safe distance from Plaintiff's vehicle;
3. Defendant failed to timely apply the brakes of his 18-wheeler in order to avoid the collision in question;
4. Defendant failed to control his speed; and
5. Defendant failed to safely operate his tractor-trailer.

B. NEGLIGENCE ENTRUSTMENT – DEFENDANTS FEDEX AND EXAM TRANSPORT

As an additional cause of action, Plaintiff would show that at the time and on the occasion in question, Defendants FedEx and Exam Transport were the owner and insured of the vehicle driven by Defendant Ronald Miller, Jr.

Defendants FedEx and Exam Transport entrusted the vehicle to Defendant Ronald Miller, Jr. Defendant Ronald Miller, Jr. was unlicensed, incompetent, and/or reckless and Defendants FedEx and Exam Transport knew or should have known that Defendant Ronald Miller, Jr. was unlicensed, incompetent, and/or reckless. Defendant Ronald Miller, Jr.'s negligence on the occasion in question proximately caused the collision.

C. RESPONDEAT SUPERIOR – DEFENDANTS FEDEX AND EXAM TRANSPORT

Additionally, Plaintiff would show that at the time and on the occasion complained of, Defendant Ronald Miller, Jr. was in the course and scope of his employment with Defendants FedEx and Exam Transport thereby making

Defendants FedEx and Exam Transport liable under the doctrine of *Respondeat Superior*.

D. NEGLIGENCE – DEFENDANTS FEDEX AND EXAM TRANSPORT

Defendants FedEx and Exam Transport negligently hired and retained Defendant Ronald Miller, Jr. Moreover, Defendants FedEx and Exam Transport failed to properly qualify, train and/or supervise Defendant Ronald Miller, Jr. in order to prevent such collision.

VII. DAMAGES

As a proximate result of Defendants' negligence, Plaintiff suffered extensive injuries and damages. As a result of Plaintiff's injuries, Plaintiff suffered the following damages:

- a. Medical expenses in the past and future;
- b. Lost wages in the past and loss of earning capacity in the future;
- c. Property damage and loss of use of Plaintiff's vehicle;
- d. Physical impairment in the past and future;
- e. Physical pain and suffering in the past and future; and
- f. Mental anguish in the past and future.

VIII. INTENT TO USE DEFENDANTS' DOCUMENTS

Plaintiff hereby gives notice of intent to utilize items produced in discovery against the party producing same. The authenticity of such items is self-proven per TRCP 193.7.

IX. JURY TRIAL

Plaintiff demands a trial by jury and includes the appropriate jury fees.

X. U.S. LIFE TABLES

Notice is hereby given to the Defendants that Plaintiff intends to use the U.S. Life Tables as prepared by the Department of Health and Human Services.

XI. RELIEF

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that Defendants be cited to appear and answer herein, and that upon final hearing thereof, Plaintiff recover judgment against Defendants for:

1. Plaintiff's past medical expenses, which are reasonable and customary for the medical care received by Plaintiff;
2. Plaintiff's future medical expenses;
3. Plaintiff's lost wages in the past and loss of earning capacity in the future;
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6. Plaintiff's mental anguish in the past and future in an amount to be determined by the jury;
7. Plaintiff's physical impairment in the past and future in an amount to be determined by the jury;
8. Interest on the judgment at the legal rate from the date of judgment;
9. Pre-judgment interest on Plaintiff's damages as allowed by law;
10. All costs of court; and
11. Such other and further relief to which Plaintiff may be justly entitled.

Respectfully submitted,

WITHERITE LAW GROUP, PLLC

BY: /s/ Victor Rodriguez

VICTOR RODRIGUEZ

State Bar No. 24063577

victor.rodriquez@witheritelaw.com

SHELLY GRECO

State Bar No. 24008168

shelly.greco@witheritelaw.com

901 W. Vickery Blvd., Suite 900

Fort Worth, TX 76104

817/263-4466

817/263-4477 (fax)

ATTORNEYS FOR PLAINTIFF

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Brenda Rodriguez on behalf of Victor Rodriguez
Bar No. 24063577
Brenda.Rodriguez@witheritelaw.com
Envelope ID: 56439335
Status as of 8/23/2021 2:57 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brenda Rodriguez		brenda.rodriguez@witheritelaw.com	8/18/2021 4:24:04 PM	SENT
Trece Phillips		trece.phillips@witheritelaw.com	8/18/2021 4:24:04 PM	SENT
Victor Rodriguez		victor.rodriguez@witheritelaw.com	8/18/2021 4:24:04 PM	SENT
Vicki McDowell		vicki.mcdowell@witheritelaw.com	8/18/2021 4:24:04 PM	SENT

Case Information

DC-21-10441 | IBSA HASSAN vs. RONALD MILLER, et al

Case Number

DC-21-10441

File Date

08/09/2021

Court

116th District Court

Case Type

MOTOR VEHICLE ACCIDENT

Judicial Officer

PARKER, TONYA

Case Status

OPEN

Party

PLAINTIFF

HASSAN, IBSA

Active Attorneys ▼

Lead Attorney

RODRIGUEZ, VICTOR R

Retained

DEFENDANT

MILLER, RONALD

Address

16175 SOUTHEAST 49TH STREET ROAD

OCKLAWAHA FL 32179

DEFENDANT

FEDEX CUSTOM CRITICAL INC

Address

SERVE REG AGENT CT CORPORATION SYSTEM

1999 BRYAN ST STE 900

DALLAS TX 75201

DEFENDANT

EXAM TRANSPORT & CO LLC

Address

SERVE REG AGENT ASIF ALIDINA
533 GREENWOOD ST
KINGSTON TN 37763

Events and Hearings

08/09/2021 NEW CASE FILED (OCA) - CIVIL

08/09/2021 ORIGINAL PETITION ▼

ORIGINAL PETITION

08/09/2021 ISSUE CITATION ▼

ISSUE CITATION - RONALD MILLER, JR.

ISSUE CITATION - FEDEX CUSTOM CRITICAL, INC

ISSUE CITATION - EXAM TRANSPORT & CO LLC

08/09/2021 JURY DEMAND ▼

JURY DEMAND

08/12/2021 CITATION ▼

Unserved

Anticipated Server

ESERVE

Anticipated Method

Comment

RONALD MILLER, JR

08/12/2021 CITATION ▼

Unserved

Anticipated Server

ESERVE

Anticipated Method

Comment

FEDEX CUSTOM CRITICAL, INC

08/12/2021 CITATION ▼

Unserved

Anticipated Server

ESERVE

Anticipated Method

Comment

EXAM TRANSPORT & CO LLC

08/18/2021 AMENDED PETITION ▼

PLAINTIFF'S 1ST AMENDED PETITION

08/18/2021 ISSUE CITATION ▼

Comment

2 CIT/ ES

Financial

HASSAN, IBSA

Total Financial Assessment	\$372.00
Total Payments and Credits	\$372.00

8/10/2021	Transaction Assessment	\$356.00
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8/10/2021	CREDIT CARD - TEXFILE (DC)	Receipt # 51605-2021-DCLK	HASSAN, IBSA	(\$356.00)
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8/23/2021	Transaction Assessment	\$16.00
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8/23/2021	CREDIT CARD - TEXFILE (DC)	Receipt # 55107-2021-DCLK	HASSAN, IBSA	(\$16.00)
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Documents

ORIGINAL PETITION

JURY DEMAND

ISSUE CITATION - RONALD MILLER, JR.

ISSUE CITATION - FEDEX CUSTOM CRITICAL, INC

ISSUE CITATION - EXAM TRANSPORT & CO LLC

PLAINTIFF'S 1ST AMENDED PETITION